

**IN THE DISTRICT COURT OF THE UNITED STATES
OKLAHOMA EASTERN DISTRICT**

GREAT LAKES INSURANCE SE,)	
)	
Plaintiff,)	Case No.: CIV-23-52-JAR
vs.)	
)	6:23-CV-00052-JAR
WAGNER & LYNCH, PLLC,)	
)	Hon. Jason A. Robertson
Defendant.)	
)	

DEFENDANT'S PRELIMINARY WITNESS LIST

COMES NOW the Defendant, Wagner & Lynch, P.L.L.C., by and through their attorney of record Wesley J. Cherry, and submits the following preliminary witness list pursuant to the Court's Scheduling Order to exchange the same.

WITNESSES

No.	Name and Address	Anticipated Testimony
1	Blake Lynch, c/o counsel	Will testify as to the facts and circumstances surrounding this litigation, specifically regarding the nature of the problems surrounding the water damage and the claim denial; additionally, damages.
2	Amanda Littlejohn, c/o counsel	Will testify as to the facts and circumstances surrounding this litigation, specifically regarding the nature of the problems surrounding the water damage.
3	Randy Howard, c/o Plaintiff's counsel	Anticipated testimony regarding adjusting the claim of the insurance policy.
4	Representative of Superior Plumbing. 1474 Blackberry Road, Indianola, OK 74442.	Will testify as to the facts and circumstances surrounding the water damage and repair.
5	Representative of FloodServ, 201 W. Cherokee, McAlester, OK 74501.	Will testify as to the facts and circumstances surrounding the water damage and repair.
6	Representative of BayTown Construction. P.O. Box 375, Crowder, OK 74430.	Will testify as to the extent of damage to and repair to the building.

7	Oklahoma Eastern District Court Clerk	Will testify as to prior pleading(s) filed in prior case(s) and their veracity.
8	All witnesses listed by Defendants not objected to by Plaintiff.	TBD
9	Deposed witnesses	TBD
10	Corporate representative(s) of Plaintiff pursuant to Rule 30(b)(6)	TBD
11	Any witnesses listed by Plaintiff not objected to by Defendant.	TBD
12	Any expert witness(es) designated by Plaintiff and not objected to by Defendant.	TBD
13	Any expert witness(es) designated by Defendant and not objected to by Plaintiff.	TBD
14	Any witness necessary to lay the foundation for any exhibit(s).	TBD
15	Any witness identified through ongoing discovery.	TBD
16	Nils Rauniker 123 West Main St. Wilburton, OK 74578	Will testify as to building damage.

As Discovery is ongoing, Defendant reserves the right to supplement this List.

DATED this 5th day of May, 2023.

Respectfully submitted by:



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CERTIFICATE OF SERVICE

I CERTIFY that on this 5th day of May, 2023, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notifications to the following:

Michael Linscott, OBA #17266
Alexandra Gage, OBA #33874
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Attorneys for Plaintiff

I CERTIFY that on this 5th day of May, 2023, I sent the foregoing to the following individuals without the use of the CM/ECF system, via U.S. Mail, all postage pre-paid:

NONE.



Attorney for Defendant